

05/12/2022

CENTRAL DISTRICT OF CALIFORNIA

BY: jm DEPUTY

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Attorneys for Plaintiff
 UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

NATALIE LE DEMOLA ET AL.,

Defendant.

CR 2:22-cr-00205-JFW

GOVERNMENT'S EX PARTE APPLICATION
FOR ORDER SEALING INDICTMENT AND
RELATED DOCUMENTS; DECLARATION OF
GREGORY BERNSTEIN

(UNDER SEAL)

The government applies ex parte for an order that the indictment and related documents in the above-titled case be sealed until the government files a "Report Commencing Criminal Action." This ex parte application is made pursuant to Federal Rule of Criminal Procedure 6(e) (4) and is based on the attached declaration of Gregory Bernstein.

Dated: May 11, 2022

Respectfully submitted,



GREGORY BERNSTEIN
 Assistant United States Attorney

Attorneys for Plaintiff
 UNITED STATES OF AMERICA

DECLARATION OF BERNSTEIN

I, Gregory Bernstein, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I represent the government in the prosecution of the above-captioned case.

2. The indictment in this case will imminently be presented to a federal grand jury in the Central District of California.

3. The defendants in this case are not aware of the pending indictment. Publishing the indictment on the open docket could jeopardize the government's ability to safely apprehend the defendants.

4. Accordingly, the government requests that the indictment and sealed documents in this case, except the arrest warrants, be sealed until one of the defendants is taken into custody on the charges contained in the indictment and the government files a "Report Commencing Criminal Action."

5. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed in the Central District of California on May 11, 2022.



GREGORY BERNSTEIN
ASSISTANT UNITED STATES ATTORNEY